

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

AMERICAN ALLIANCE
FOR EQUAL RIGHTS,

Plaintiff,

v.

WINSTON & STRAWN LLP,

Defendant.

Case No. 4:23-cv-04113

**JOINT MOTION TO EXTEND
PRELIMINARY INJUNCTION BRIEFING SCHEDULE
AND RESPONSIVE PLEADING DEADLINE**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiff American Alliance for Equal Rights and Defendant Winston & Strawn (collectively, “the “Parties”) jointly request that the Court modify the below deadlines as follows:

- Extend the deadline for Defendant to file its opposition to Plaintiff’s motion for a preliminary injunction, Dkt. 2, to December 11, 2023; and
- Extend the deadline for Defendant to answer or otherwise respond to the Complaint to 21 days after the final resolution of the motion for a preliminary injunction, including interlocutory appeal, if any.

In support of this request, the Parties state the following:

1. Plaintiff filed its Complaint, Dkt. 1, on October 30, 2023.

2. Plaintiff also filed its Motion for Preliminary Injunction, Dkt. 2, on October 30, 2023. Accordingly, Defendant's opposition to Plaintiff's motion is currently due on November 20, 2023, *see* Local Civ. R. 7.3. Plaintiff's reply is currently due on November 27, 2023, *see* Local Civ. R. 7.4(e).

3. Defendant agreed to waive service of the Complaint and motion, Dkt. 12, on November 1, 2023.

4. Defendant has only recently engaged counsel in this matter and requires additional time to finalize its opposition to Plaintiff's motion for a preliminary injunction.

5. Defendant will begin accepting applications for the 2024 1L program on December 1, 2023.

6. Defendant will cease accepting applications for the 2024 1L program on February 16, 2024.

7. Defendant will select fellows on a rolling basis beginning in January 2024.

8. The Parties therefore respectfully submit that good cause exists for the Court to extend: (i) the deadline for Defendant to file its opposition to Plaintiff's motion for a preliminary injunction to December 11, 2023; and (ii) the deadline for Defendant to answer or otherwise respond to Plaintiff's

Complaint to 21 days after the final resolution of the motion for a preliminary injunction, including interlocutory appeal, if any.

9. The Parties certify that this is their first request for an extension of time for this purpose, this extension is not requested for the purpose of undue delay, and this extension will not prejudice the conduct of the litigation.

Date: November 10, 2023

Respectfully submitted,

WINSTON & STRAWN LLP

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CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2023, I electronically filed the foregoing document with the Clerk of Court using the Court's CM/ECF system, which will automatically send email notification of such filing to all counsel of record.



Paula W. Hinton